

Exhibit L

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03-md-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN) ECF Case |

DECLARATION OF KOFI OSEI NYANTAKYI

I, Kofi Osei Nyantakyi, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was working at the Millenium Hilton Hotel and was present at 55 Church Street, across the street from the towers, when the terrorist attacks of the World Trade Center Towers occurred.

4. I was in New York City at Ground Zero when the planes hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to

a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

5. When the passenger plane struck our tower, I was working as a doorman at the Millenium Hilton Hotel at 55 Church Street. I was present at the entrance to the Hotel when the first plane collided with Tower One. I was extremely shocked by the impact and the horrifying sight above me. The Hotel management and I watched the results of the initial strike. I witnessed horrific scenes of people jumping from the Towers. Initially, I thought that there was a net to catch them. I soon realized that they were falling to their deaths. After leaving the Hotel and running from the scene, the second passenger plane struck Tower Two. The Hotel shook after the impact. Items weighing several tons were knocked over. Police started evacuating people from the area, and EMS and the fire department arrived.

6. While I was running, I heard an enormous noise. Later I learned that this was one of the Towers collapsing. Shortly after this noise, I was engulfed in pitch blackness. The crowd around me started a stampede away from the collapsing tower. People ran over me, and I was covered with debris and ash. Some of the debris fell onto my right hand and injured it. For two hours after the initial collision, I wandered around the downtown area. I was eventually able to get to the Soho Grant Hotel, where I found a phone to call my wife. My family was distraught about the events that morning and was acutely relieved that I was alive. I secured a ride on the D train from the 42nd Street train station.

7. Because of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: lacerations and bruises on my right hand and both forearms; injuries to my knees, right wrist, and gluteal area; injuries to my neck, which causes pain to radiate to both arms, accompanied by stiffness and numbness; and injuries to my back, specifically to the lumbar spine

where I endured a neuroforaminal disc herniation at L4-5 with spinal cord stenosis and left lateral disc herniation at L2-3 and L3-4 with left neuroforminal narrowing. I can no longer lift more than an occasional thirty pounds due to the injuries I sustained during the attacks.

8. Due to these horrific terrorist attacks and the atrocities that I witnessed on 9-11, I also experienced and continue to experience significant PTSD, including anxiety, apprehension, dysphoria, distress, bouts of dejection, hyperactivity, irritability, and nightmares. Since the incident, I am particularly reactive to the sounds of planes, trains, and other loud noises. I have trouble sleeping, have struggled with insomnia, and have interrupted sleep patterns. My nightmares are filled with screaming people, which often cause me to awake in a state of alarm and covered in sweat. I fear returning to downtown Manhattan, and I worry about a recurrence of the incident. I have suffered and continue to suffer both physically and mentally due to the traumatic events of these terrorist attacks.

9. I sought medical attention for my above physical and mental injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received because of the September 11, 2001 terrorist attacks.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 8th day of January 2020.



Signature of Declarant

Kofi Osei Nyantakyi

Exhibits Filed Under Seal